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2 On June 2, 2018, DEFENDANT murdered and/or conspired with others to
3 murder Decedent.

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5 Decedent died in Portland, Oregon on June 2, 2018 from multiple gunshot
6 wounds. The cause of death was ruled a homicide.

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8 On September 14, 2018, DEFENDANT was indicted by a Multnomah County
9 grand jury for the following felony crime: Murder with a Firearm – Constituting Domestic
10 Violence. The corresponding case number for the criminal matter is Multnomah County
11 Criminal Case No. 18CR59251.

12 **FIRST CLAIM FOR RELIEF – WRONGFUL DEATH**

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14 PLAINTIFF realleges and incorporated paragraphs 1-6 above.

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16 Decedent was married to DEFENDANT at the time of his death and was
17 preceded in death by his parents. He is survived by his wife, the DEFENDANT, and
18 one adult child: Nathaniel Stillwater. By operation of the Oregon Slayer Statute
19 illuminated in ORS 112.465(1), and DEFENDANT'S murder or conspiracy to commit
20 murder of Decedent, DEFENDANT is treated for purposes of this claim as having
21 predeceased Decedent.

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2 As a result of DEFENDANT'S crime of causing the murder of Decedent,
3 PLAINTIFF is entitled to recover for the following harms and losses pursuant to ORS
4 30.020(2):

5 (a) An amount that would justly, fairly and reasonably have compensated the
6 Decedent for disability, pain and suffering during the period between his
7 injury and his death, in an amount determined to be fair by a jury but not to
8 exceed \$200,000.00.

9 (b) An amount that would justly, fairly and reasonably compensates the
10 Decedent's estate for pecuniary loss, in an estimated amount not to
11 exceed \$500,000.00; and

12 (c) An amount that would justly, fairly and reasonably compensated Nathaniel
13 Stillwater for his loss of Decedent's society and companionship in an
14 amount determined to be fair by a jury but not to exceed \$1,000,000.00.

15 **PRAYER**

16 WHEREFORE, PLAINTIFF prays for judgment against DEFENDANT for a claim
17 for Wrongful Death as follows:

18 (a) A fair amount, not to exceed \$200,000.00 that would justly, fairly and
19 reasonably have compensated Decedent for disability, pain and suffering
20 during the period between his injury and his death;

21 (b) An amount not to exceed \$500,000.00 that would justly, fairly and reasonably
22 compensate Decedent for Pecuniary loss;

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1 (c) A fair amount, not to exceed \$1,000,000.00 that would justly, fairly and
2 reasonably compensate PLAINTIFF for his loss of Decedent's society and
3 companionship; and
4 (d) Costs and disbursements incurred herein.

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Dated this 19th day of February, 2019.

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Attorney for Plaintiff

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